

REMARKS/ARGUMENTS

This paper is in response to the final Office Action of July 26, 2005.

Applicants thank the Examiner for his careful review of this application. Applicants amend independent claims 1, 8, and 14 and dependent claims 3-6, 10-13, and 16-19. Claims 2, 7, 9, 15, and 20 are canceled. The amended claims introduce no new matter and are fully supported by the specification. Accordingly, Applicants respectfully request reconsideration of pending claims 1, 3-6, 8, 10-14, and 16-19 in view of the following amendments and the remarks submitted in support thereof.

Rejections under 35 U.S.C. § 103(a)

The Examiner rejected claims 1, 3-6, 8, 10-14 and 16-19 under 35 U.S.C. § 103(a) as being unpatentable over Wakeley et al. (Patent No. 6,463,498) in view of McCarty et al. (Patent No. 5,954,796), and further in view of Wilson (Patent No. 6,151,331). In light of the arguments contained herein, Applicants respectfully request that this rejection be withdrawn.

To establish a *prima facie* case of obviousness, the prior art references must teach or suggest all the claim limitations of the Applicants' invention (See M.P.E.P. §2143). Although the Applicants believe that the original pending claims are defined over the prior art of record, the Applicants have amended claims 1, 3-6, 8, 10-14, and 16-19 to further distinguish the Applicants' claimed invention from the prior art.

In contrast with the recited features in claims 1, 8, and 14, Wakeley et al. does not disclose constructing an address database having a device entry that includes a device address which associates the Fibre Channel Address and SCSI-based address (i.e., port target ID and LUN ID) of the device. In particular, the Applicants disagree with the Examiners' assertion that the D_ID and the S_ID features cited in FIG.3 of

Wakeley et al. respectively disclose the SCSI-based address (i.e., port target ID and the LUN ID) of a device as claimed in the Applicants' invention.

FIG. 3 of Wakeley et al. discloses a method for piggybacking SCSI protocol commands (i.e., read or write) or data on top of a Fibre Channel protocol frame to facilitate transmission of SCSI commands or data to a SCSI device connected to the Fibre Channel network (See column 1, 40-44; column 6, lines 51-52; and column 7, lines 6-10). Wakeley et al. specifically teaches that the D_ID is a "24-bit FC address indicating the destination FC Port for the frame" and that the S_ID is a "24-bit address that indicates the FC Port that transmitted the frame" (See column 6, lines 61-67). In Wakeley et al., FC is used as an abbreviation for "Fibre Channel" (See column 1, lines 14-15). In short, the D_ID and S_ID are Fibre Channel addresses that are different distinct addresses (i.e., destination and source) where each address is associated with different ports; in contrast to the port ID and the LUN ID that together make-up a single SCSI-based address. Therefore, Wakeley et al. does not teach or suggest constructing an address database as claimed in the present invention.

The Examiner asserts that Wilson discloses "the device entry associates an Arbitrated Loop Physical Address (AL_PA) with the SCSI port target identifier." The Applicants respectfully disagree with this assertion. Specifically, the "node name" contained in the look-up table disclosed in Wilson is not equivalent to the SCSI-based address in claims 1, 8, and 14 as amended herein. Applicants submit that there is simply no disclosure in Wilson to characterize a "node name" as a SCSI-based address containing both a port target ID and a LUN ID. This conclusion is supported by Wilson teaching that a "node name" corresponds to an IP address (See Wilson column 5, lines 52-67). Applicants respectfully request that the Examiner specify how an IP address represented by a "node name" discloses a port target ID and LUN

ID, which correspond to a single SCSI-based address, if this rejection is maintained.

As acknowledged by the Examiner, Wakeley et al. does not disclose that “an address database facilitates translation of an operating system independent command[[s]] received by a Fibre Channel wrapper module into a Fibre Channel command[[s]] usable by a Fibre Channel layer module that is in communication with a Fibre Channel controller, the operating system independent commands being a Common Hardware Interface Module (CHIM) command” as recited in claims 3, 8, and 17. Applicants have amended this feature to include that the operating system independent command is a CHIM command. McCarty et al. is silent as to a CHIM command feature. Applicants respectfully request that the Examiner elaborate how the link path (225) between the Fibre Channel environment and the OS environment of McCarty et al. teach an address database of claims 3, 8 and 17 if this rejection is maintained.

For at least the above reasons, Applicants respectfully request that this rejection be withdrawn for independent claims 1, 8 and 14 and dependent claims 3-6, 10-13, and 16-19 which depend, directly or indirectly, from them.

SUMMARY

In view of the foregoing amendments and remarks, Applicants respectfully submits that the pending claims are in condition for allowance. Applicants respectfully requests reconsideration of the application and allowance of the pending claims. If the Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact Roger C. Kuan at (408) 774-6927.

If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. ADAPP171). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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